


SCRANTON

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MAY 26 2013  
PER   
DEPUTY CLERK

HENRY UNSELD WASHINGTON  
PLAINTIFF

JAMES L. GRACE, defendants et al

CIVIL ACTION NO. 4:08-CV-1283

DECLARATION OF HENRY UNSELD WASHINGTON  
IN SUPPORT OF ORDER TO SHOW CAUSE FOR AN  
PRELIMINARY INJUNCTION AND OR A PERMANENT  
INJUNCTION IN COMPLIANCE TO THE COURT ORDER  
DATED 3-8-13, Doc#123, AT P.5

I, HENRY UNSELD WASHINGTON, AM THE PLAINTIFF IN THE ABOVE CAPTION:  
HEREBY DECLARES:

I HAVE BEEN INCARCERATED AT SCI-GREENE SINCE 8-14-09; THE ENTIRE TIME BEING HOUSED IN THE RHU. THIS IS MY SECOND TIME BEING HOUSED AT SCI-GREENE, I.E., 10-12-94 THRU AUGUST 1997.

1. SEVERAL TIMES OVER ALL OF THE ISSUES RAISED IN THE INSTANT LEGAL ACTION WERE PRESENTED IN DETAIL TO PHS CORPORATE OFFICE, PA, DOC COMMISSIONER, EXECUTIVE DEPUTY COMMISSIONER, DEPUTY COMMISSIONERS, WARDEN, WARDEN'S ASSISTANT, DEPUTY WARDENS, ADMINISTRATIVE 2, MAJORS, RHU CAPTAINS-LIEUTENANTS-N-SERGEANTS, CAPTAIN-N-LIEUTENANTS OF SECURITY, COUNSELORS, F-G-N-H-BLOCK SERGEANTS, HEALTH CARE ADMINISTRATOR, PSYCHIATRIC COORDINATOR, PSYCHOLOGISTS; WHEREAFTER, SOME RESPONDED BY PERSONALLY PARTICIPATING IN THE ON-GOING ABUSES; EVEN THE PA, DOC COMMISSIONER-N-DEPUTY COMMISSIONER BOTH THREATEN TO DO ME BODILY HARM; MOST OPENLY DECLARED TO HAVING GIVEN ALL DOC STAFF-N-MEDICAL PROFESSIONAL UNDER THEIR COMMAND DIRECT ORDERS TO PHYSICALLY ASSAULT ME, TO OPEN-N-READ ALL OF MY OUT GOING MAIL, DENY ME FOOD, OUT DOOR EXERCISE, ACCESS TO MY RELIGIOUS PRACTICE, AND MEDICAL TREATMENT EVEN IF IT CAUSED MY DEATH. . . . THEIR RATIONALE IS TO PENALIZE ME FOR SUING THEM, FILING LAWSUITS AGAINST DOC STAFF-N-MEDICAL PROFESSIONALS; AND FOR CONTINUOUSLY COMMUNICATING WITH AUTHORITIES. . . . MANY DOC STAFF AND MEDICAL PROFESSIONALS READILY DECLARE THAT THEIR ABUSE WERE DONE PER THE DIRECT ORDERS OF THEIR SUPERVISOR. . . . AT THE EXACT MOMENT MOST OF THE ABUSES CURRENTLY BEING ORDERED AGAINST ME ARE BEING ORDERED BY ROBERT GILMORE, S. P. DURCO, C. HAYWOOD, P. E. BARKEFELT, F. GREGG, A. MORRIS, LT. KELLY, SGT. IREY, S. GERVIN, J. M. SMITH, BYUNGSHAK JIN, M. PARK.

2. MY LIFE IS BEING ENDANGERED BY THE COMBINATION OF INDIVIDUALS DOC STAFF-N-MEDICAL PROFESSIONALS WHO ARE CURRENTLY BEING SUED BY OR IT'S THEIR BIOLOGICAL RELATIVES, SPOUSE, IN LAWS, FRIENDS, NEIGHBORS, ARMY BUDDIES, SOMEONE THEY GREW UP WITH, ATTEND THE SAME CHURCH; A FEW OF THE MANY NAMES ARE; BOTH OF THE DENNISON BROTHERS, MICHELUCCI, KELLY, SGT. IREY, C. TEBERI, PAWLOWSKI, M. PARK, B. POKOL, DAVENPORT, R. GILMORE, THE ENTIRE H-N-I BLOCK STAFFS; ALL WHO REPEATEDLY DECLARE PRIOR TO ABUSING ME-N-AFTER, THEY ARE DOING SO TO PENALIZE ME FOR SUING SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS, AND FOR MY CONTINUOUS COMMUNICATION WITH AUTHORITIES, SO THEIR THREATS ARE NOT JUST WORDS ALONE, THEIR THREATS ARE REINFORCED ACTIONS, OFTEN PHYSICAL-N-SEXUAL ASSAULTS, DENIAL OF FOOD-N-MEDICAL TREATMENT, BASIC HUMAN NEEDS, ACCESS TO OUT GOING MAIL, RELIGIOUS PRACTICE, DESTRUCTION OF PERSONAL PROPERTY-N-LEGAL DOCUMENTS PERTAINING TO THIS INSTANT LEGAL ACTION, FALSIFYING-N-FABRICATING MISCONDUCT REPORTS, etc, THEREFORE, WHY WOULDN'T I BELIEVE IT WHEN THEY OPENLY DECLARE TO ME, THEY ARE GOING TO MURDER ME OR HAVE MURDERED, AND I WILL NEVER BE SAFE IN SCI-GREENE-N-ANY-N-ALL PRISONS LOCATED IN NORTHERN, CENTRAL, AND WESTERN, PA. . . . THEN-N-FOREVER AFTER I AM TERRIBLY AFRAID FOR MY LIFE

3. I AM NEAR 70 YEARS OF AGE, IN A STATE OF PROGRESSIVE FAILING HEALTH, SICK-N-IN PAIN NOT STOP ON A DAILY BASIS DUE TO SEVERAL NON CONTINUOUS DISEASES, THAT ARE INCURABLE, NORMALLY, I AM 215-220 LBS. WITH BUILDING MUSCLES. . . TO DATE! I LACK STRENGTH, ENERGY, STAMINA, ENDURANCE, AND MUSCLES; AND I WEIGH JUST ABOVE 170 LBS FULLY CLOTHED; I AM JUST TOO WEAK-N-SICKLY TO DEFEND MYSELF AGAINST JUST ONE MAN WEIGHING 250-PLUS POUNDS, 20-45 YEARS YOUNGER THAN I, WHOSE INTENTIONS ARE TO EXTRACT CHUNK OF MY FLESH-N-INFLECT PAIN UPON ME; LET ALONE 6-10 MEN ALL ARMED WITH 3-FOOD BATONS, ELECTRIC SHIELDS, TASERS, STUN GUNS, PEPPER SPRAY; WEARING A HELMET, FACE GUARD-N-FULL BODY ARMOR, WHOSE BENT ON THE INTENT OF INFLECTING PAIN-N-SUFFERING ON ME; THEN WHAT FOLLOWS IS I AM HELPLESS, SO MY BUTTOCK BECOMES THEIR PERSONAL-N-GRAB PLAY GROUND; DOC STAFF-N-MEDICAL PROFESSIONALS MASSAGE THEIR

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4. ON MORE THAN ONE OCCASION DOCTOR HYUNGHAK JIN, KNOWING THAT I WAS EXPERIENCING HEARTATTACK SYMPTOMS, HE ATTEMPTED SEVERAL TIMES TO SPIT IN MY FACE, VOWED TO MURDER ME OR HAVE ME MURDERED, DENIED ME EMERGENCY MEDICAL TREATMENT, AND LEFT ME HELPLESS ON THE FLOOR. . . SEVERAL TIMES HE HAS VOWED TO NEVER PROVIDE ME WITH MEDICAL TREATMENT. . . MORE THAN ONCE FOR NON MEDICAL REASONS DR. B. JIN HAD ME PLACED IN A PSYCHIATRIC OBSERVATION CELL FOR EXTENDED PERIODS OF TIME WHERE THE TOILET, FLOOR, WALLS, BED FRAME, SINK, FIXTURE-N- DOOR WERE ALL COVERED WITH HUMAN FECES. . . DOCTOR JIN ON TWO SEPARATE OCCASIONS HAD MY OUT DOOR EXERCISE TAKEN FOR MORE THAN 140-STRAIGHT DAYS BASED ON NON MEDICAL REASONS. . . SEVERAL TIMES DR. JIN SEXUALLY ASSAULTED ME; CONTINUOUSLY COMING TO MY CELL DOOR, SEXUALLY HARASSING ME, . . WHILE I EXPERIENCED HEARTATTACK SYMPTOMS DR. JIN CAME TO MY CELL, SAYING ALL I NEEDED WAS FOR HIM TO GIVE ME A GOOD FUCKING, REPEATEDLY ADDRESSED ME AS HIS 'SUGAR, SWEETHEART, HONEY, etc, THEN DENIED ME HIS EMERGENCY MEDICAL TREATMENT. . . AS I WAS EXPERIENCED HEARTATTACK SYMPTOMS, DR. JIN HAD ME RESTRAINED AS HE ATTEMPTED TO PLACE HIS MOUTH ON THE NIPPLE OF MY CHEST FOR THE SAKE OF HIS WITHDRAWING 'CHEST MILK' FROM ME. IN EACH INSTANCE, DR. JIN DECLARED HIS PURPOSE FOR DENYING ME MEDICAL TREATMENT-N-EMERGENCY MEDICAL TREATMENT WAS TO PENALIZE ME FOR SUING HIM, AND MY CONTINUOUS COMMUNICATIONS WITH AUTHORITIES
5. ON MORE THAN TWO OCCASIONS WHILE EXPERIENCING INTENSE CHEST PAIN-N-A THUNDEROUS HEARTBEAT, MY BIG TOE SWOLLEN-N-THE NAIL DISCHARGING PUS-N-BLOOD, AND ANKLES SWOLLEN FAR BEYOND THEIR NORMAL SIZE, DR. M. PARK THREATEN TO MURDER ME OR HAVE ME MURDERED, DENIED ME MEDICAL TREATMENT. . . BASED ON NON MEDICAL REASONS DR. PARK DISCONTINUED MY ENHANCEMENT SNACK BAG. . . IN EACH INSTANCE DR. M. PARK DECLARED HE WAS DENYING ME MEDICAL TREATMENT-N-my ENHANCEMENT SNACK BAG TO PENALIZE ME FOR SUING SCI-GREENE MEDICAL PROFESSIONALS, AND MY COMMUNICATIONS WITH AUTHORITIES.
6. ON SEVERAL OCCASIONS PLAINTIFF WAS DISCOVERED BY G-BLOCK DOC STAFF LYING MOTIONLESS ON THE FLOOR, EMERGENCY MEDICAL WAS CALLED; AND EMERGENCY MEDICAL PERSONNEL, IN EACH INSTANCE DENIED ME MEDICAL TREATMENT; DECLARED LET PLAINTIFF DIE TO PENALIZE PLAINTIFF FOR HIS SUING SCI-GREENE MEDICAL PROFESSIONALS-N-my COMMUNICATIONS WITH AUTHORITIES; LEAVING PLAINTIFF COVERED IN BLOOD, STRUGGLING TO BREATHE, WITH A THUNDEROUS HEARTBEAT, ON THE FLOOR BARELY MOVING. . . ON ONE OCCASION PLAINTIFF CELL RESEMBLED A CRIME SCENE, H-BLOCK STAFF TURNED OFF MY EMERGENCY CALL BUTTON, AND REFUSED TO CALL FOR EMERGENCY MEDICAL TREATMENT ON MY BEHALF, H-BLOCK STAFF STOPPED AT MY DOOR MORE THAN ONCE DECLARED THE REASON THEY DIDNT CALL FOR EMERGENCY MEDICAL TREATMENT SO IT WOULD DIE AS A PUNISHMENT FOR MY SUING H-BLOCK DOC STAFF-N-my COMMUNICATIONS WITH AUTHORITIES
7. EACH TIME SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS THREATEN TO VIOLATE MY RIGHTS THEY HAVE REINFORCED THEIR THREATS WITH THEIR ACTIONS, e.g. EACH TIME MEDICAL PROFESSIONALS FOLLOWED THEIR THREATS UP IN THEIR ACTIONS OF SEXUAL-N-PHYSICAL ASSAULTS, SEXUAL HARASSMENT, DENIAL OF MEDICAL TREATMENT. . . TO DATE! I AM UNABLE TO SPEAK ALOUD DUE TO A VICIOUS PHYSICAL ASSAULT BY SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS. . . I AM NEAR BLIND IN MY RIGHT EYE AFTER BEING STRUCK ON THE HEAD WITH A WEAPON BY SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS. . . H-BLOCK DOC STAFF SPAT TOBACCO JUICE INTO MY RECTUM MORE THAN ONCE. . . ROUTINELY, JAMMED THEIR FINGER INTO MY RECTUM WHILE PRETENDING TO ESCORT ME TO MEDICAL. . . GRIND THEIR KNUCKLES INTO MY SKULL. . . G-BLOCK STAFF DESTROYED MY COLLECTOR'S ITEMS IN VALUE OF \$10-15,000. . . BECAUSE I DID ANSWER QUESTIONS DURING THE DEPOSITION ON 1-28-13, C. HAYWOOD, S.P. DURCO, A. MORRIS, P.E. BARKEFELT, R. GILMORE, AND L. KELLY. HAVE DESTROYED APPROXIMATELY 40- OF MY RELIGIOUS BOOK PRICED AT \$25-\$40 EACH. . . H-BLOCK OFFICER, J. SUHAN DESTROYED MY 14-PAGE DOCUMENT CRUCIAL TO THIS INSTANT LEGAL ACTION, AND HE DESTROYED MY OUT GOING LETTER TO AN ATTORNEY. . . P.E. BARKEFELT, S. GIVEN, OFFICERS DAVENPORT-N-J. SUHAN FABRICATED MORE THAN TWO MISCONDUCTS AGAINST ME. . . . SCI-GREENE DOC STAFF HAVE DENIED ME FOOD MORE THAN 1,000-TIMES, TO THE EXTENT I EXIST IN A PERMANENT STATE OF HUNGER, HAVING TO SCOURGE THE FLOOR FOR FOOD, RETRIEVE ITEMS FROM THE TOILET TO EAT, I AM FORCED TO BEG FOR FOOD AT ALL TIMES. . . DUE TO MY INABILITY TO ORDER A FURNISHED, INTERNATIONAL COFFEE-N-ORANGE JUICE, I AM FORCED TO EAT STALE BREAD THAT UNDEFINITELY MAKE ME SICK ON A DAILY BASIS, . . JUST TO CITE A FEW ABUSES THAT REINFORCE THREATS.
8. I AM INDIGENT INMATE, I DO NOT HAVE FUNDS TO PURCHASE NEW ITEMS, SO ALL OF THE FOREMENTIONED PROPERTY ITEMS ARE PERMANENTLY LOSS. . . IT IS INEVITABLE THAT THE ON-GOING PHYSICAL ABUSES WILL RESULT INTO YET ANOTHER PERMANENT INJURY, OR MY DEATH INTENTIONALLY INFLICTED BY DOC-STAFF-N-MEDICAL PROFESSIONALS, BECAUSE I HAVE ABSOLUTELY NO WAY TO PROTECT MYSELF FROM THEIR CONTINUOUS ABUSE



THAN 1,000-TIMES, TO THE EXTENT I EXIST IN A PERMANENT STATE OF HUNGER, HAVING TO SCROUNGE THE FLOOR FOR FOOD, RETRIEVE ITEMS FROM THE TOILET TO EAT, I AM FORCED TO BEG FOR FOOD AT ALL TIMES. . . DUE TO MY DIGESTIVE DISORDER I AM UNABLE TO EAT APPROXIMATELY 80% OF THE FOOD ITEMS BEING SERVED WITHOUT MY EXPERIENCING A VIOLENT OUTBREAK OF PAINFUL INTESTINAL ~~CRAMP~~ CRAMPS-N-GRIPE, SO I AM FORCED TO EAT FOODS THAT WILL DEFINITELY MAKE ME SICK ON A DAILY BASIS; JUST TO CITE A FEW ABUSES THAT REINFORCED THREATS

8. I AM A INDIGENT INMATE, I DO NOT HAVE FUNDS TO PURCHASE NEW ITEMS, SO ALL OF THE FOREMENTIONED PROPERTY ITEMS ARE PERMANENTLY LOST. . . IT IS INEVITABLE THAT THE ON-GOING PHYSICAL ABUSES WILL RESULT INTO YET ANOTHER PERMANENT INJURY OR MY DEATH INTENTIONALLY INFLICTED BY DOC STAFF N-MEDICAL PROFESSIONALS BECAUSE I HAVE ABSOLUTELY NO WAY TO PROTECT MYSELF FROM THEIR CONTINUOUS ABUSE

N.B. FOR THE SAKE OF CORRECTING THE LATER PART OF PAGE TWO



9. I AM CURRENTLY EXPERIENCING DEMENTIA, AND VISIONS-N-DREAMS OF BEING VIOLENTLY GANG RAPED BY SCI-GREENE STAFF-N-MEDICAL PROFESSIONALS, LEAVING MY RECTUM SO TORN-N-TATTERED THAT I AM PERMANENTLY RENDERED UNABLE TO HAVE A BOWEL MOVEMENT, SO I AM FITTED WITH A GASTROLOGY BAG. . . THESE CONDITIONS ARE PROGRESSIVELY GETTING WORST, WHICH EXPLAINS WHY IT IS TYPICAL FOR ME TO TAKE 2-3 DAYS TO COMPLETE AN ENDEAVOR WHICH THE AVERAGE PERSON WOULD COMPLETE WITHIN 10-15 MINUTES. . . THE HONORABLE JUDGE, MARTIN C. CARLSON, IN HIS EARLY RULINGS ON THIS CASE MENTIONED SEVERAL TIMES THAT I HAVE PSYCHOLOGICAL PROBLEMS, BUT TO DATE! HE CONTINUES TO PUNISH ME FOR MY HAVING A PROGRESSIVE DEMENTIA AND FOR MY NOT BEING GIFTED WITH THE USE OF THE ENGLISH LANGUAGE, AND WHAT FOLLOWS IS THE CONTINUOUS SEXUAL ASSAULT-N-PHYSICAL ASSAULTS, AND SEXUAL HARASSMENT BY SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS WILL EXAGGERATE MY DEMENTIA-N-PSYCHOLOGICAL CONDITIONS TO SUCH A DEGREE I WILL IMMINENTLY LOSE TOUCH WITH REALITY

10. DUE TO DEFENDANTS CONTINUOUS THREATS ON MY NOT BEING SAFE! IN SCI-GREENE, AND ALL PRISONS LOCATED IN NORTHERN, CENTRAL, AND WESTERN, PA. IN MY ATTEMPT TO EXPLAIN TO THE COURT THAT MY SAFETY WOULD ONLY BE SECURED BY BEING IN PERMANENT HOUSING IN A PRISON LOCATED OUTSIDE OF THE NORTHERN, CENTRAL-N-WESTERN, PA. AREAS: IS BASED ON THE REPEATED THREATS OF SCI-GREENE STAFF-N-MEDICAL PROFESSIONALS, WHO TO DATE! HAVE FOLLOWED EACH THREAT WITH THEIR ACTIONS, AND HAD I WAITED UNTIL I AM PLACED IN ANOTHER PRISON LOCATED IN NORTHERN, CENTRAL, AND WESTERN, PA; THEN SAID MY LIFE IS BEING THREATENED AT THIS PRISON, THEN, JUDGE CARLSON, WOULD ACCUSE ME OF A PRANK OR A PLOY, THUS IS WHY I WAS UP FROM BASED ON THE THREATS I HAVE REPEATEDLY RECEIVED: SO BECAUSE OF MY INABILITY TO ELABORATELY ARTICULATE THE NECESSITIES-N-NEEDS TO SECURE MY SAFETY, JUDGE, MARTIN C. CARLSON PUNISHING ME, SAYING I AM DEMANDING THIS-N-THAT. . . TO DATE! PER THE DICTATES OF ~~THE~~ PSYCHOLOGISTS-N-PSYCHIATRISTS IN EVERY PRISON WHERE I'VE BEEN HOUSED, SUCCINCTLY STATES I AM TO NEVER BE HOUSED IN THE SAME CELL WITH ANOTHER INMATE OTHERWISE IT WILL CAUSE THE DEATH OF THAT INMATE. THEREFORE, I AM AT THIS EXACT MOMENT A SINGLE CELL STATUS INMATE; NEVER HAVE I BEEN A DOUBLE CELL STATUS INMATE, AND ALWAYS HAVE BEEN A SINGLE STATUS INMATE, SO I AM NOT! DEMANDING TO BE CHANGED TO SINGLE CELL STATUS. . . IT IS SOUND LOGIC THAT HAVING MOVED ME TO A SAFE HAVEN UNTIL I HAVE PROVIDED DEFENDANTS WITH A DEPOSITION, THEN THE DOC RETURN ME BACK TO A PRISON LOCATED IN THE AREA SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS HAVE REPEATEDLY DECLARED I'LL NEVER BE SAFE IN, I.E. NORTHERN, CENTRAL-N-WESTERN, PA. WOULD BE A RECIPE FOR MY DEATH. . . SCI-GREENE, AND ALL OTHER PRISONS IN THE PA. DOC ON A DAILY BASIS PROVIDE A SAFE REFUGE TO ALL INMATES WHO WERE ABUSED BY DOC STAFF-N-MEDICAL PROFESSIONALS BY MOVING THAT INMATE TO THE OTHERSIDE OF THE STATE. . . THE SAME WITH INMATES WHO HAVE DIGESTIVE DISORDERS, THESE INMATES ARE PROVIDED WITH A ENHANCEMENT SNACK ~~AND~~ BAG. . . THE SAME WITH INMATES WITH A NEED TO BE SEEN BY SPECIALISTS FOR INCURABLE DISEASE. . . THESE ARE ALL DONE FOR THOUSANDS OF INMATES THOUSANDS OF TIMES A DAY ON A DAILY BASIS THROUGH OUT THE PA. DOC. . . ALL OF MY HEALTH PROBLEMS HAVE ALREADY BEEN DIAGNOSED, AND THE ABUSE BY SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS ARE STILL ON GOING TO DATE! . . . SO THE THINGS I AM SUGGESTING TO SECURE MY SAFETY ARE MERELY THE STATUS QUO

11. SCI-GREENE RHU POLICY DICTATES THAT ALL INMATES WHO SUBMIT A SICK CALL REQUEST ARE SEEN THE NEXT DAY BY THE PAC AT THEIR CELL DOOR WITHOUT BEING REMOVED FROM THEIR CELL. . . IN PERFECT COMPLIANCE WITH SCI-GREENE RHU POLICY THE PAC PROVIDES INMATES THEIR MEDICAL TREATMENT ON A DAILY BASIS AT THEIR CELL DOOR WITHOUT THAT INMATE BEING REMOVED FROM THEIR CELL. . . YET, I AM BEING DENIED THE DUE PROCESS OF THE SCI-GREENE RHU POLICY AFFORDED ALL OTHER SCI-GREENE RHU INMATES: WHEREBY I AM BEING FORCED TO SUBMIT TO THE EXACT SAME INDIVIDUALS WHO ARE CONTINUOUSLY SEXUALLY-N-PHYSICALLY ASSAULTING ME, SEXUALLY HARASSING ME, AND THREATEN MY LIFE TO DATE! I.E. DR. B. JIN, DR. M. ~~PARK~~ PARK, AND OFFICER T.S. OSWALD, BY REMOVING ME FROM MY CELL WHEREBY I AM EXPOSED TO A VARIETY OF PHYSICAL-N-SEXUAL ABUSES, AND THIS WOULDNT OF OCCURRED HAD I BEEN AFFORD THE SAME DUE PROCESS OF SCI-GREENE RHU POLICY AS PROVIDED TO ALL OTHER SCI-GREENE RHU INMATES, I.E. MEDICAL TREATMENT THE NEXT DAY BY THE PAC AT MY CELL DOOR WITHOUT REMOVING ME FROM MY CELL. . . IT IS OBVIOUS THAT THE REASON WHY EACH TIME I SUBMIT A SICK CALL REQUEST DR. B. JIN-N-DR. M. PARK MAKES A PROTRACTED EFFORT TO PREVENT MY BEING SEEN BY THE PAC, AND DEMANDING THAT I AM REMOVED FROM MY CELL, AND ONLY THEY, I.E. DR. JIN-N-DR. PARK, MUST PROVIDE ME THE EXACT SAME IDENTICAL MEDICAL TREATMENT THE PAC PROVIDES TO ALL OTHER RHU INMATES AT THEIR CELL DOOR WITHOUT REMOVING THAT INMATE FROM THEIR CELL ON A DAILY BASIS; THE REASON IS SO DR. JIN, DR. M. PARK, AND T.S. OSWALD CAN PHYSICALLY-N-SEXUALLY ASSAULT ME-N-THREATEN MY LIFE

12. NONE OF THE FOREGOING ISSUES CANNOT BE PROPERLY CORRECTED BY HONORABLE, JUDGE, MARTIN C. CARLSON ASKING THE EXACT SAME IDENTICAL INDIVIDUALS I AM CURRENTLY SUING, AND TO DATE! ARE CURRENTLY VIOLATING MY RIGHTS I.E. PHYSICAL-N-SEXUAL ASSAULTS SEXUAL HARASSMENT, DENYING ALL BASIC HUMAN NEEDS, 1st, 4th, 5th, 6th, 8th, AND 14th AMENDMENTS, AND RLUIPA RIGHTS; TO GIVE (3) THEIR INPUT, WHEN IT IS CONSPICUOUSLY



THEY ARE GOING TO DO ANYTHING TO DO ME. DOCUMENT 129, FILED 03/26/13, PAGE 15, DOC STAFF-N-MEDICAL PROFESSIONALS TO CONTINUE PHYSICALLY-N-SEXUALLY ABUSING ME, SEXUALLY HARASSING ME, VIOLATING MY 1ST, 4TH, 5TH, 6TH, 8TH, AND 14TH AMENDMENTS, AND RLUIPA RIGHTS. . . . How AM I TO PROVIDE DEFENDANTS WITH A DEPOSITION WITHOUT BRING PHYSICAL HARM DOWN UPON MYSELF; FIRST-N-FOR-EMOST, I SUFFER WITH DEMENTIA, SO MY MEMORY IS NOT SOUND; THE EXACT SAME DOC STAFF WHOM I AM CURRENTLY SUING ARE WITHHOLDING THE BULK OF MY RELIGIOUS-N-LEGAL LITERATURE IN BLATANT DEFIANCE OF A COURT ORDER SO HOW AM I TO RESPOND TO QUESTIONS WITH STUDYING PAST LITERAZON. I AM PERFECTLY RARING-N-VERY WILLING TO PROVIDE ANSWERS TO DEFENDANTS DEPOSITION, BUT NOT AT THE EXPENSE OF MY LIFE. . . . JUDGE MARTIN C. CARLSON IS HOLDING ME RESPONSIBLE FOR THE WRONG DOING OF DEFENDANTS, I AM NEAR 70-YEAR OF AGE. I CANNOT STOP WHAT DEFENDANTS ARE CURRENTLY DOING TO ME. I HAVE NO IDEA WHEN THE NEXT VIDEO HEARING IS SCHEDULED, BUT THE ABUSE IS ONGOING NOW, AND CHANCES ARE THE ABUSES WILL NOT STOP BEFORE THE NEXT SCHEDULED VIDEO HEARING; FOR ME TO DO AS ~~HE~~ <sup>FORCED</sup> SUGGESTING MEANS I AM TO WILLING SUBMIT TO HAVING FINGERS, CARROT, CUCUMBERS, etc. ~~FORCED~~ INTO MY RECTUM; STRUCK WITH BLUNT OBJECTS, A KNIFE DRIVEN INTO MY SPINE OR HIP STRUCK WITH A CLOSED FIST-OR OPEN HAND, DENIED FOOD, PROPERTY DESTROYED, RETALIATED AGAINST; DENIED MEDICAL TREATMENT ACCORDING TO RHU POLICY. . . . THE FRCP DOES NOT DICTATE THAT I MUST FOLLOW MYSELF TO BE SEXUALLY-N-PHYSICALLY ASSAULTED, SEXUALLY HARASSED, DENIED ALL BASIC HUMAN NEEDS AND POSSIBLY MURDERED, FOR THE SAKE OF PROVIDING A DEPOSITION. . . . I HAVE NEVER REFUSED TO PROVIDE DEFENDANTS WITH A DEPOSITION, I AM EAGER TO DO SO, TO DATE! DEFENDANTS ARE PREVENTING ME FROM DOING SO WITH THEIR NON-STOP ABUSE. . . . JUDGE MARTIN C. CARLSON, LAST RULING IS GIVING SCI-GREENE DOC-STAFF-N-MEDICAL PROFESSIONAL THE GREEN LIGHT WITH THEIR ABUSE. . . . IN COURTS THROUGHOUT THE UNITED STATES, THE COURT DOES <sup>NOT</sup> RELY ON THE WORDS OF THE ACCUSED TO DECIDE WHERE THE TRUTH LIES. . . . GIVING HEAVY WEIGHT TO THOSE WHO COMMITTED THE CRIMES BASED ON THEIR DENIAL; YET TO DATE! I AM BEING ABUSED DAILY, STILL JUDGE, MARTIN C. CARLSON CONTINUES TO TOTALLY IGNORE MY COUNTLESS APPEALS TO HIM FOR RELIEF WHILE HE ACCEPTS THE WORDS OF THE VILLAINS AS FACTUAL. . . . CAMERAS-N-MONITORS ONLY AID-N-ABET COVER UP OF CRIMES BY DOC STAFF-N-MEDICAL PROFESSIONALS.

N.B. PLUS, THE U.S. JUSTICE DEPARTMENT TOLD ME EXPLICITLY TO AVOID DR. BYUNGHAK JIN, DR. M. PARK, MS. DONALDSON, A.K.A. MS. WEST; AND OFFICER, T.S. OSWALD.

13. PLEASE TAKE THE TIME TO SERIOUSLY CONSIDER THE ISSUES RAISED IN PLAINTIFF MOTION TO SHOW CAUSE FOR WRIT OF MANDAMUS, SUBMITTED TO THE COURT ON 1-28-13; MORE THAN SIX WEEKS AGO, WITH NO REVIEW BY THE COURT TO DATE!

#### CONCLUSION

I HAVE NOT REFUSED TO PROVIDE DEFENDANTS WITH A DEPOSITION, I WILL NEVER REFUSE TO DO SO, I AM WILLING-N-EAGER TO DO SO; TO DATE! I AM BEING PREVENTED FROM DOING SO BY DEFENDANTS THEMSELVES. I WANT TO GIVE DEFENDANTS A DEPOSITION; DEFENDANTS ARE NOT ALLOWING ME TO DO SO.

MY LIFE IS IN IMMINENT RISK OF PERMANENT IRREPARABLE ACTUAL INJURY, OR DEATH DUE TO THE CONTINUOUS ONGOING ABUSES BY SCI-GREENE DOC STAFF AND MEDICAL PROFESSIONALS ALL OF WHICH I AM UNABLE TO PROTECT MYSELF FROM BEING IMMINENTLY SERIOUSLY INJURED PERMANENTLY, OR MURDERED.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORE GOING IS TRUE-N-CORRECT, PURSUANT TO 28 USC 1746; AND 18 PA. C.S. 4904. . . . EXECUTED ON 3-13-13, AT SCI-GREENE, RHU GC POD, 9-CELL; 175 PROGRESS DRIVE; WAYNESBURG, PA. 15370-8082

DATED: 3-13-13

"RESPECTFULLY SUBMITTED"

S/ Henry Unsel Washington

HENRY UNSELD WASHINGTON  
AM 3086 PRO SE.